

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN,  
LOSARTAN, AND IRBESARTAN  
PRODUCTS LIABILITY  
LITIGATION

MDL No. 2875

THIS DOCUMENT RELATES TO ALL  
CASES

HON. ROBERT B. KUGLER  
CIVIL NO. 19-2875 (RBK)(KMW)

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**CERTIFICATION OF JOHN R. DAVIS IN SUPPORT OF *DAUBERT*  
MOTION TO EXCLUDE OPINIONS OF WAYNE GIBSON**

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I John R. Davis, certify as follows:

1. My name is John R. Davis. I am an attorney at law in Austin, Texas, and a partner with the law firm of Slack Davis Sanger, LLP, and serve as Court-appointed Plaintiffs' Executive Committee ("PEC") counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' Motion to Exclude Testimony of Mylan Expert Eric Sheinin, Ph.D.
2. Attached hereto as **Exhibit 1** is a true and correct copy of Mr. Gibson's July 27, 2023 Expert Report, marked as Exhibit 2 to his Sept. 20, 2023 deposition.
3. Attached hereto as **Exhibit 2** is a true and correct copy of Mr. Gibson's Dec. 29, 2023 Supplemental Expert Report, marked as Exhibit 11 to his Feb. 5, 2024 deposition.
4. Attached hereto as **Exhibit 3** is a true and correct copy of certain excerpts of Mr. Gibson's Sept. 20, 2023 deposition.

5. Attached hereto as **Exhibit 4** is a true and correct copy of certain excerpts of Mr. Gibson's February 5, 2024 deposition.
6. Attached hereto as **Exhibit 5** is a true and correct copy of Walgreen's December 22, 2023 Responses and Objections to Plaintiffs' First Set of Interrogatories.
7. Attached hereto as **Exhibit 6** is a true and correct copy of certain excerpts of the February 1, 2024 depositin of Dr. Rena Conti.
8. Attached hereto as **Exhibit 7** is a true and correct copy of certain excerpts of the March 10, 2021 Rule 30(b)(6) deposition of Hai Wang.
9. Attached hereto as **Exhibit 8** is a true and correct copy of certain excerpts of the March 11, 2021 Rule 30(b)(6) deposition of Hai Wang.
10. Attached hereto as **Exhibit 9** is a true and correct copy of certain excerpts of the March 25, 2022 deposition of Dr. Lauren Stiroh.
11. Attached hereto as **Exhibit 10** is a true and correct copy of certain excerpts of the February 24, 2022 deposition of Mr. Timothy Kosty.
12. Attached hereto as **Exhibit 11** is a true and correct copy of the Supplemental Expert Report of Dr. Rena Conti dated December 1, 2023.

Executed this 12th day of February, 2024.

/s/ John R. Davis  
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